REMARKS

By this amendment, Claims 2 and 9 are canceled and Claims 1, 12, and 19 are amended. The specification is also amended. In view of the amendments and remarks, Applicant respectfully asserts that the objections and rejections are now moot, and that pending claims are in condition for allowance.

Drawing Objections

The Office Action also objects to the drawings under 37 CFR 1.84(p)(4), for purported use of the reference character 202H to designate the right center border cell and left center border cell, and under 37 CFR 1.83(a) because they fail to show references 204D and 204E as described in the specification.

With respect to the rejection under 37 CFR 1.84(p)(4), Applicant respectfully asserts that the drawings utilize separate reference characters, 202H and 202D, to designate the left center border cell, and right center border cell, as illustrated in FIG. 2 of the drawings and as referenced at page 5 of the specification. Therefore, Applicant requests that the objection under 37 CFR 1.84(p)(4) be canceled.

With respect to the rejection under 37 CFR 1.83(a), Applicant has amended the specification, as detailed above, to correct errors in reference characters. Specifically, reference characters 204D and 204E are not illustrated in the drawings because the references were mislabeled in the specification. The specification has been amended to correctly identify reference characters 240D (in place of 204D), and 240E (in place of 204E). Both reference characters 240D and 240E are shown in the drawings and it is believed that no new matter is added by this amendment. Therefore, Applicant requests that the objection under 37 CFR 1.83(a) be canceled.

Claim Rejections – 35 U.S.C. §102 and §103

In the Office Action, Claims 1-5, 12, 13, and 15 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,088,708, to Burch et al (*"Burch"*). Additionally, Claims 6 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Burch* in view of U.S.

Patent No. 6,061,700, to Brobst et al ("*Brobst*"), and Claims 7, 9, and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Burch* in view of U.S. Patent No. 6,311,196, to Arora ("*Arora*"). Claims 8 and 17 were also rejected for §103(a) obviousness over *Burch*, *Arora*, and a publication titled Windows 3.1, Special Edition, to Cowart ("*Cowart*"), and Claim 11 was rejected as being obvious over *Burch*, *Arora* and U.S. Patent No. 5,649,133, to Arquie ("*Arquie*"). Furthermore, Claim 19 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,008,809, to Brooks ("*Brooks*") in view of *Burch*, and Claim 20 was similarly rejected under §103(a) as unpatentable over *Brooks*, *Burch*, and *Brobst*.

A.   The *Burch* Reference

Burch is recited in the office action as the basis for rejection of Claims 1-5, 12, 13, and 15 were rejected under 35 U.S.C. §102(e), and as a primary reference for each of the rejections for obviousness under 35 U.S.C. §103. *Burch* generally discloses the use of an HTML table, where graphical elements are loaded into the table cells to define the presentation of the web page. The graphical elements are loaded into table cells such that the layout of cells and their content preserves the layout of the page while avoiding the requirement that a single image for the page be generated. The invention described in the application is the "Microsoft Publisher 97" software.

More specifically, *Burch* defines a process whereby graphical elements define the structure of the table cells. An illustrative example of this is shown in FIGS. 2-5. As shown in FIG. 2, a page is initially comprised of multiple objects, some of which may overlap. These objects are then grouped (FIG. 3) into common rectangles, and then mapped (FIG. 4) to a table. Because the rectangles cross into multiple table cells, *the table cells are then redefined*, as shown in FIG. 5. Thus, the layout of objects defines the table set-up, such that cells may require merging to prevent overlapping of cells and objects.

B.   The Amended Independent Claims Are Patentable

Independent Claims 1, 12, and 19 are amended herein to recite that the content webpage is displayed entirely within the inline frame, and that the number of border cells surrounding the

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inline frame remain fixed. These amendments further distinguish the present invention from Burch.

As described above, *Burch* teaches an application that generates an HTML version of a page (that includes text, graphics, or both) via the isolation of overlapping objects to create overlap groups (see col. 6, lines 16-32) comprised of non-overlapping rectangles. The publishing module of *Burch* then generates an HTML table using the coordinates of the non-overlapping rectangles, where the HTML table preserves the look of the original page. Therefore, in *Burch* the generation of the HTML table is directly dependent on the content of the page, where the content establishes the number of table cells. Furthermore, the table cells each carry portions of non-overlapping content. Unlike *Burch*, the present invention does not alter the number of table cells based upon the content provided. Rather, the amended claims recite that the number of border cells remain fixed. This is not disclosed or suggested by *Burch*, which relies on the use of a varying number of cells to present the non-overlapping rectangles. Using a fixed number of cells would therefore prevent the generation of an HTML table from creating non-overlapping rectangles for a pages having a variety of content and/or layouts.

Furthermore, in the amended claims the present invention uses only a single frame (i.e., the IFrame) to display content. *Burch*, on the other hand, requires that page objects be mapped to cells reproduced via multiple table cells. Because a webpage is always reproduced entirely within the IFrame, the present invention avoids the requirement that content be mapped into a variable number of table cells, or into more than a single, center cell.

Concerning the 35 U.S.C. §103 rejections, the Office Action notes that *Burch* fails to teach certain aspects of the original claims, such as the display of a border, the proportional resizing of the display area, border and content webpage, or the ability to access and display a second content webpage in an inline frame. To provide these features, the Office Action combines *Burch* with multiple references to formulate §103 obviousness rejections, including: *Brobst* (purportedly teaching a window structure like that of Burch, but also having the ability to display content from a second webpage in an inline frame); *Arora* (purportedly teaching the display of a border and webpage content placed therein, along with the proportional resizing of the two); *Cowart* (purportedly teaching a website having the look and feel of an application
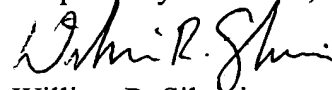
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program); *Arquie* (purportedly teaching the determination of a window size, and the ability to resize it to a default size); and *Brooks* (purportedly teaching a website display generated by a network server and the ability of a network server to transmit web pages to web browsers.)

Each of the above references fails to disclose or teach the access and display of a webpage using a table having a fixed number of border cells surrounding a center cell including an inline frame, where the inline frame is used to access and display webpage content. Therefore, for the same reasons discussed above with respect to *Burch*, Applicant respectfully asserts that the amended independent claims are patentable over each of the recited references. Furthermore, because independent Claims 1, 12, and 19 are patentable, the dependent claims are allowable as a matter of law.

Conclusion

It is not believed that extensions of time or fees for addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 19-5029.
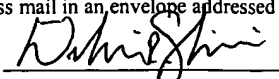
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I hereby certify that this paper, along with any paper referred to as being attached or enclosed, is being deposited with the United States Postal Service on November 10, 2003, with sufficient postage as first-class mail in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

William R. Silverio

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